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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

Plaintiff,

vs.

MARK Y. KOLYVANOV

Defendant.

Case No. 3:20:CR-00273-IM

**DEFENDANT'S UNOPPOSED MOTION
TO MODIFY CONDITIONS OF
RELEASE**

Mark Kolyvanov, through his counsel, moves the Court for an Order modifying Mr. Kolyvanov's pretrial release conditions. Specifically, Mr. Kolyvanov moves the Court to remove the condition imposing a 10:00 PM to 06:00 AM curfew. Mr. Kolyvanov further moves the Court to modify the condition prohibiting entry within a five block radius of the United States courthouse so as to allow Mr. Kolyvanov to enter within that area for employment purposes. Mr.

Kolyvanov proposes the following language (proposed addition in bold):

"The defendant shall not enter within the five blocks surrounding the federal courthouse in Portland, Oregon, defined as SW Washington Street to the north, the Willamette River on the east, SW Market Street to the south and SW Park Avenue to the west. **Notwithstanding this prohibition, Defendant is permitted to enter within the above-boundary at any hour in order to travel directly to and directly from 835 SW Second Avenue, Portland, OR 97204, if doing so is necessary for purposes of Defendant's employment.**"

The basis for the motion is set forth in the attached declaration of counsel and is unopposed by Assistant United States Attorney Parakram Singh.

Respectfully submitted on September 22, 2020.



Christopher Marin Hamilton
Attorney for Defendant Mark Kolyvanov